

(EU General Data Protection Regulation 2016/679, Articles 13 and 14)

Controller	Research Council of Finland
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Legal basis and purpose of personal data processing	<p>The Research Council of Finland is a central government authority in the Ministry of Education, Science and Culture's administrative branch whose statutory duty is to promote scientific research and research framework conditions as well as their utilisation by funding them and by participating in international cooperation. Additionally, the Research Council acts as an expert in the development and implementation of science policy and carries out other tasks assigned to it (Act on the Academy of Finland 922/2009).</p> <p>The Research Council of Finland collects and processes personal data to implement the research funding process. The funding process consists of the processing and review of research funding applications, preparation, implementation, monitoring and supervision of research funding decisions, communication of positive funding decisions, reporting of funded projects and processing of payments. Personal data processing complies with statutory obligations (GDPR Article 6(1)c).</p> <p>For example, in international research funding cooperation, the Research Council of Finland may act as a joint controller in the same funding call with one or more funding organisations. The controllers will then, as required by GDPR Article 26, define in a transparent manner their respective responsibilities for complying with the obligations laid down in the GDPR, in particular as regards the exercise of data subjects' rights and their duties to provide information in accordance with Articles 13 and 14, by means of an arrangement between them.</p> <p>As a government aid authority, the Research Council of Finland has a supervisory role under the Act on Discretionary Government Transfers (688/2001) under which the Research Council must ensure appropriate and adequate control of the government aid by obtaining information on the use of grants as well as other information on funding awarded.</p> <p>In accordance with the performance agreement between the Ministry of Education, Science and Culture and the Research Council of Finland, the Research Council will work actively with key stakeholders to improve the quality and impact of research, education and innovation by providing high-quality science policy data and analyses to various parties and developing methods for assessing the impact of research and research activities, which will be made available openly to all. In addition, the Research Council, as a public authority, must promote the transparency of its activities and, if necessary, draw up guidance, statistics and other publications as well as data on its services, decision-making practices and social conditions and their</p>

	<p>development in its field of activity (Act on the Openness of Government Activities (621/1999)).</p> <p>The Research Council of Finland collects and processes personal data in order to meet its objectives and comply with its statutory obligations by producing high-quality science policy data and analyses, such as various statistics, for the use of various parties. In this respect, the processing of personal data is based on compliance with legal obligations (GDPR Article 6(1)(c)) and on the performance of tasks of general interest (GDPR Article 6(1)(e)).</p> <p>In addition, the Research Council may process personal data of the researchers it funds for the performance of tasks carried out in the public interest, such as the granting or presentation of prizes and awards for scientific work (GDPR Article 6(1)(e)). The processing of personal data for this purpose is described in a separate privacy notice.</p>
Data subjects and categories of personal data	<p>The data subjects are funding applicants, persons working within funded projects, Research Council officials, representatives of research organisations (e.g. commitment issuers, invoicers, representatives) as well as experts, invited experts and decision-makers who participate in the review of applications.</p> <p>In connection with its research funding activities, the Research Council of Finland processes the following personal data (the list is indicative only):</p> <ul style="list-style-type: none"> <li>- Basic details: surname, first name, gender, nationality, personal identity code, date of birth, preferred language, current position, telephone number, organisation, institution, email and/or postal address.</li> <li>- Expertise: research fields, possible keywords.</li> <li>- Curriculum vitae: surname (including previous ones), first names, researcher ID (e.g. ORCID, ResearcherID), degrees (title, major/programme or equivalent, name of institution, date); titles of docent (university, discipline, date); professorships (university, discipline, date); language skills; current employment details (title, employer, academic career stage, dates; full-time student: institution, title, degree programme or equivalent; secondary employment); previous work experience (previous employment, grant periods incl. longer-term visits abroad: dates, position, employer/funder; previous secondary employment and other relevant duties and responsibilities); career breaks (family leaves, military/non-military service, other leave or other possible reason with dates); research funding and grants (significant research funding: dates, type, provider and amount of funding, own role, name of principal investigator); research outputs; research supervision and management experience; teaching merits; awards and honours; major other academic achievements; scientific and social impact.</li> </ul> <p>In addition, for experts, the following personal data are processed for the payment of fees: first name and surname in passport, gender, date of birth, tax number, home address and bank account number.</p> <p>In addition, the Research Council of Finland processes personal data contained in the research plan, such as the personal data of the research team (name and educational level of the researchers; tasks and roles of those working on the</p>

	<p>project and their main merits) and the personal data of the collaborators (main collaborators and their roles). In addition, for publication lists, the name of the author of the publication and the name and publisher of the article or publication are processed.</p> <p>In addition, the Research Council of Finland processes personal data contained in the reports of funded projects, such as the principal investigator (personal details/CV, see above), persons working on the project and authors of the thesis (name/ORCID, gender, year of birth, research field, career stage, person-months, employer), visitors to the project (name, nationality, career stage, duration of visit, organisation), publications (name of author), degrees (name, degree, year, research field) and collaborators (name, type, research field, country).</p>
<p>Categories of recipients of the personal data</p>	<p>The personal data are processed by Research Council of Finland staff. Applicants' personal data are processed by members of the review panels and by experts evaluating the applications. In international calls, the review process may be carried out outside the Research Council in accordance with the agreement for the international network of research funders. Applicants' personal data are processed by decision-making bodies in the context of decision-making.</p> <p>The data are disclosed only according to the duties and permissions granted in Finnish legislation. The right of public access is regulated under the Finnish Act on the Openness of Government Activities (621/1999). Public documents are disclosed according to sections 13 and 16 of the Act. An official document may be secret if it has been so provided. Confidential information or data may be given access to or disclosed only with the consent of the person concerned, to the person concerned, or by virtue of a legal right.</p> <p>The Research Council of Finland publishes on its website the name, title and organisation of the members of the decision-making bodies.</p> <p>The Research Council of Finland may publish on its website information on funding decisions (funding scheme, organisation, research topic, applicant/contact person, decision number, decision date, funding period, amount of funding, public description) for funded projects, provided that the applicant/contact person has given consent to the publication.</p> <p>After funding decisions have been made, the Research Council of Finland may publish on its website the names, titles and organisations of the members of the review panels and the individual experts, provided that they has given consent to the publication. Information on panel members is published on a panel-by-panel basis.</p> <p>The Research Council of Finland submits funding decision data on funded projects to the Ministry of Education, Science and Culture's national research information repository for publication in the online portal <a href="http://www.research.fi">www.research.fi</a>. See the <a href="#">Ministry's privacy notice</a>.</p> <p>For funding calls opened after 1 October 2023, decision data on all applications will be submitted to a joint system for administering discretionary government</p>

	<p>grants, maintained by the State Treasury. <a href="#">See the privacy notice for the system.</a></p> <p>The Academy produces high-quality science policy data, analyses and statistics in such a way that individuals are not directly or indirectly identifiable from them.</p> <p>The Finnish Government Shared Services Centre for Finance and HR (Palkeet) processes the personal data contained in payment requests in connection with the processing of the requests.</p> <p>Service providers have access to the data as required by set agreements.</p>
Transferring personal data to a third country or an international organisation	<p>Personal data may, on a case-by-case basis, be transferred to third countries outside the EEA if established international research funding collaboration requires it concerning certain international funding opportunities. Unless the third country is a country, region or sector declared as offering an adequate level of protection through a European Commission decision, adequate level of data protection is primarily secured by appropriate safeguards, such as a contract between public officials or the European Commission's standard contractual clauses. In exceptional circumstances, the transfer may also be based on a matter of public interest.</p>
Period for which the personal data will be stored	<p>For funded projects, the funding application documents with annexes and the review reports of panels and individual experts are kept in the case management system for five years after project completion. In the case of projects that were not funded, the corresponding documents will be stored for two years after the decision. Project reports will be kept in the case management system for ten years after project completion.</p> <p>With the entry into force on 1 October 2023 of the obligation to provide minimum information on discretionary government grant decisions, the following retention periods will apply in the case management system (changes will be implemented in July 2023): for funded projects, funding application documents with annexes and panel and individual expert review reports on applications will be kept for ten years after project completion. In the case of projects that were not funded, the corresponding documents will be stored for five years after the decision. Project reports will be kept in the case management system for ten years after project completion.</p> <p>The name of the applicant, the funding scheme, the site of research, the title of the project and the application number are permanently stored in the case management system of the Research Council of Finland.</p> <p>The bank account information of expert reviewers is deleted from the online services (SARA) when their reviewer role ends. Within the retention periods identified above, personal data held in the online services and information system will be transferred to a system under development that will replace the current system, taking into account the needs for science policy data, analysis and statistics.</p>

	<p>The archiving plan of the Research Council of Finland contains more detailed provisions on archiving. The Finnish Archive Act (831/1994) regulates the archiving duties of authorities.</p>
<p>From which source the personal data originate if not obtained from the data subject</p>	<p>When a user logs in to the Research Council of Finland's online services (SARA) via the HAKA identification system, the user's name, personal identity number, host organisation, EduPrincipalName and email address are retrieved from the organisation.</p> <p>For payment purposes, the site of research shall provide the Research Council with the following personal data: name, gender, year of birth, nationality, research career stage, hours worked, salary (working time and compensation paid in the project under the full cost model).</p> <p>Other personal data of persons working on or associated with the project (e.g. project staff receiving external funding, visits, publications, degrees obtained in connection with the project, collaboration and interaction partners) are obtained from project monitoring and reporting data. The principal investigator or a person authorised by the PI submits the research report.</p> <p>Experts/reviewers are sought from a variety of sources, such as the public website of the organisation concerned, publication databases and scientific events.</p>
<p>Rights of data subjects</p>	<p><u>Right of access to personal data</u></p> <p>The data subject has the right to obtain from the controller confirmation as to whether personal data concerning them are being processed, and, where that is the case, to obtain access to the personal data. On request, the controller shall provide a copy of the personal data undergoing processing.</p> <p>Provided that the data subject requests the above copy more frequently than once a year, the controller will charge a reasonable fee based on administrative costs.</p> <p><u>Right to rectification</u></p> <p>The data subject has the right to obtain from the controller without undue delay the rectification of inaccurate and incorrect personal data concerning them.</p> <p><u>Right to restrict processing</u></p> <p>The data subject has the right to obtain from the controller a restriction of processing, for example when the data subject contests the accuracy of the personal data, for a period enabling the controller to verify the accuracy of the personal data. Where processing has been restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of an EU member state.</p> <p><u>Right to erasure</u></p>



The data subject has the right to ask the controller to erase personal data concerning them without undue delay. This right does not apply, for example, if the processing is necessary for compliance with a legal obligation under Union or Member State law to which the controller is subject or if the processing is carried out for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. Nor does the right apply, for example, where processing is necessary for archiving purposes in the public interest, or where the right to erasure is likely to prevent or greatly complicate such processing. The controller is obliged to erase the personal data, for example if the data are no longer necessary for the purposes for which they were collected or otherwise processed.

If you have requests concerning the rights of the data subject, please contact [kirjaamo@aka.fi](mailto:kirjaamo@aka.fi).

*Right to lodge complaint with supervisory authority*

Without prejudice to any other administrative or judicial remedy, every data subject has the right to lodge a complaint with a supervisory authority, in particular in the member state of their habitual residence, place of work or place of the alleged infringement, if the data subject considers that the processing of their personal data infringes the General Data Protection Regulation. This right is without prejudice to other administrative appeal or legal remedies.

In Finland, the national supervisory authority is the Data Protection Ombudsman: [tietosuoja@om.fi](mailto:tietosuoja@om.fi), tel. +358 295 666 700.